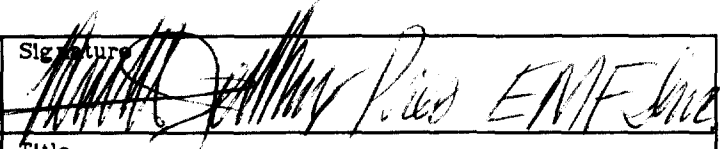


SECTION VII - CERTIFICATION (Page 5)

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.
U.S. CODE, TITLE 18, SECTION 1001.

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant Educational Media Foundation, Inc.	Signature 
Date 12-4-91	Title President

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT
AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the benefit requested is consistent with the public interest. The staff, consisting variously of attorneys, analysts, engineers and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

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Excerpts of November 21, 1991 FCC Form 340
Application Containing Studio Waiver Request Justifications

RECEIPT COPY

LAW OFFICES

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BRIAN J. CARTER
GLENN S. RICHARDS*

(202) 775-5546

November 21, 1991

*NOT ADMITTED IN D.C.

RECEIVED

NOV 21 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: KRDG (AM) Redding, California
Request for (1) Non-commercial Educational
Broadcast Construction Permit; and (2) Waiver
of Main Studio Rule

Dear Ms. Searcy:

Educational Media Foundation, Inc. ("EMF"), by its attorneys, submits this application for a non-commercial educational broadcast station construction permit. On September 12, 1991 (File no. BAL 910802EF), the Commission granted the assignment of KRDG from Prather-Breck Broadcasting to EMF. As EMF desires to operate KRDG as a non-commercial, educational station, subject to the rules relating to such stations, this Form 340 application is being filed. In addition, EMF hereby requests a waiver of 47 C.F.R. § 73.1125(a) (1990) (hereinafter "main studio rule") to allow KRDG(AM) Redding, California to operate its main studio with a reduced staff presence. If this waiver request is granted, KRDG would be operated as a satellite of KLVR(FM-ED) Santa Rosa, California. EMF is licensee of KLVR(FM-ED) which operates as a non-commercial, listener supported, educational radio station. As a satellite of KLVR(FM-ED), KRDG would provide Redding, California with a unique blend of music, programs, and special features, that will serve the educational purposes which have already been recognized by the Commission in connection with KLVR(FM-ED), and which are set out herein.

The Commission has established a policy of considering waiver requests of the main studio rule by non-commercial stations on a case-by-case basis. See Main Studio and Program Origination Rules, 3 FCC Rcd 5024, 5026 (1988). The Commission's policy is a recognition of "the benefits of centralized operations for non-commercial educational stations, given the limited funding available to these stations." Id. "Waivers have been granted to state and public television networks to operate "satellite" stations that do not necessarily meet the requirements of the main studio rule." Id. See e.g. Nebraska Educational Television Commission, 4 RR 2d 771 (1965); Central Virginia Educational Television Corp., 49 RR 2d 435 (1981). Recently, where the benefits of centralized broadcast operations were demonstrated by an educational applicant, the Commission granted a waiver of the main studio rule and permitted a non-commercial AM station to co-locate its main studio with another station operated by the applicant. The waiver request proposed that the non-commercial AM would be operated as a "satellite" of the applicant's other facility. See Letter to Gerald Stevens-Kittner, Esq. re KAGI (AM), Grants Pass, Oregon (File No. BAL-910226EC) (M.M.Bur. July 15, 1991) (copy attached hereto). The waiver was conditioned upon the applicant maintaining the public file in the non-commercial AM's city of license; the installation of a toll-free telephone number for residents of the city of license; and an imposition of a condition that the AM license remain non-commercial. Id.

EMF is in a similar position to those educational applicants who have been granted waivers of the main studio rule. In this case, EMF seeks a waiver of the main studio rule to operate KRDG as a non-commercial educational satellite, principally retransmitting KLVR(FM-ED)'s programming over KRDG. A grant of this waiver would permit EMF to offer a higher quality educational radio service to Redding than would be possible were EMF required to program KRDG from a main studio located in Redding. Educational programming requires a significant staffing commitment to produce quality programming. As a private, non-commercial educational broadcaster, EMF's limited resources would preclude the staffing and full-time operation of a main studio in Redding, without an economic drain which could damage the quality of programming it produces in Santa Rosa.^{1/}

^{1/} The Commission has never created a distinction between "public" and "private" educational noncommercial operations. Private educational broadcasters, such as EMF, face stiffer economic realities than state or public broadcasters who benefit from public monies. EMF, on the other hand, is supported only by donors and programming grants, and does not otherwise receive governmental or institutional support.

Ms. Donna R. Searcy
November 21, 1991
Page 3

Moreover, the history of KRDG does not bode well for a separate, fully staffed operation at this time. EMF is acquiring KRDG from a company which, EMF understands, during the course of its operation of the station, suffered losses totaling Two-Hundred Fifty-Thousand dollars (\$250,000.00). As was set forth in the contract accompanying the assignment application, EMF essentially purchased KRDG for less than \$50,000, a sum which is to be paid to creditors of the licensee. Given this financial history, it is clearly not economically reasonable for EMF to attempt a full scale operation of this stand-alone AM station.

In order to fulfill its local program service responsibilities, EMF will incorporate into its public affairs and informational programming matters of unique concern to residents of Redding and will maintain a studio in Redding capable of producing locally-oriented programming. EMF will maintain KRDG's public inspection file in Redding in a location accessible during normal business hours. It will also provide a toll-free telephone number for residents of Redding to reach KLVR's studio in Santa Rosa.

Moreover, EMF recognizes the importance of a licensee's remaining aware of community concerns and being accessible to local residents on a face-to-face basis. Thus, EMF plans to have employees in Redding on a regular basis to access community needs. In connection with its recognition of these obligations, EMF will staff KRDG's Redding studio at least two days of each week and will publicize the days and times at which the Redding studio will be staffed.

In that EMF's proposed operation conforms with standards established by previous Commission waiver grants for non-commercial, educational applicants, EMF submits that a grant of its waiver request would be in the public interest and should therefore be granted.

As EMF is an educational licensee, no filing fee is necessary. Therefore, none is submitted.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,



David D. Oxenford

cc: Brian Browdie, AM Branch

[9748-002]

Educational Media Foundation, Inc.
October 7, 1991

Request For Waiver of Main Studio Rule

EMF hereby requests a waiver of 47 C.F.R. § 73.1125(a) (1990) (hereinafter "main studio rule") to allow KRDG (AM) Redding, California to operate its main studio with a reduced staff presence. If this waiver request is granted, KRDG would be operated as a satellite of co-owned KLVR (FM-ED) Santa Rosa, California.

EMF desires to operate KRDG as a non-commercial, educational station. A grant of this waiver would permit EMF to offer a higher quality educational radio service to Redding than would be possible were EMF required to program KRDG from a main studio located in Redding.

In order to fulfill its local program service responsibilities, EMF will incorporate into its public affairs and informational programming originated on KLVR (FM-ED) programming of unique concern to residents of Redding and will maintain a studio in Redding capable of producing locally-oriented programming. EMF will maintain KRDG's public inspection file in Redding in a location accessible during normal business hours. It will also provide a toll-free telephone number for residents of Redding to reach KRDG's studio in Santa Rosa. EMF will staff KRDG's Redding studio at least two days of each week and will publicize the days and times at which the Redding studio will be staffed.

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Jan 1993

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN 15 1993

In Reply Refer To:
Stop Code 1800B2
8910-MSI

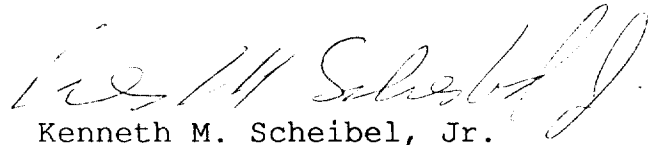
David D. Oxenford, Esq.
Fisher, Wayland, Cooper and Leader
1255 23rd Street, N.W.
Suite 800
Washington, D.C. 20037-1170

In re: KRDG(AM), Redding, California
File No. BML-911121AA
Application for Modification of License
File No. BML-911211AA
Application for Waiver of the Main
Studio Rule

Dear Mr. Oxenford:

This refers to the above-captioned applications for modification of license of KRDG(AM), Redding, California, filed by Educational Media Foundation, Inc. ("EMF") requesting (1) to change from a commercial to a noncommercial educational station (BML-911121AA), and (2) waiver of the Commission's "main studio rule," 47 C.F.R. § 73.1125 (BML-911211AA). In a telephone conversation on December 30, 1992, we requested that you provide us with information concerning EMF's asserted inability to provide a main studio in KRDG(AM)'s principal community contour due to financial constraints; however, we have not yet received this information. You are hereby advised that the failure to file the requested information within twenty (20) days of the date of this letter may result in the dismissal of the above-captioned application pursuant to 47 C.F.R. § 73.3566(b).

Sincerely,



Kenneth M. Scheibel, Jr.
Acting Assistant Branch Chief
AM Branch
Audio Services Division
Mass Media Bureau

cc: Educational Media Foundation, Inc.

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CHARLES V. WAYLAND

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OF COUNSEL

JOHN Q. HEARNE

MCI MAIL: FWCLDC

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GLENN S. RICHARDS
KELLY D. YAKSICH
JOHN M. BURGETT*
SHARON L. TASMAN*

February 11, 1993

*NOT ADMITTED IN D.C.

VIA HAND DELIVERY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: KRDG(AM), Redding, California
Application for Modification of License
FCC File No. BML-911121AA
Application for Waiver of Main Studio Rule
FCC File No. BML-9111211AA

Dear Ms. Searcy:

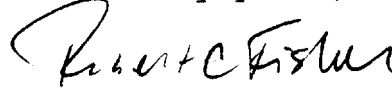
Educational Media Foundation ("EMF"), by its attorneys, hereby withdraws the above-referenced applications for modification of license and waiver of the Commission's "main studio rule."

Please also be advised that EMF and Prather-Breck Broadcasting Inc. of Redding, the licensee of KRDG(AM), Redding, California, will not consummate the assignment of license for that station. The Commission consented to such assignment on October 7, 1991 (FCC File No. BAL-910802EF).

Donna R. Searcy, Secretary
February 11, 1993
Page 2

Should you have any questions regarding the foregoing,
please contact either of the undersigned.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert C. Fisher". The signature is fluid and cursive, with the first name "Robert" and last name "Fisher" clearly distinguishable.

David D. Oxenford
Robert C. Fisher

DDO/RCF:rg
9748-002.L11

cc: Kenneth M. Scheibel, Jr. (Room 344) /
Myrtle D. Hastie (Room 344)

LAW OFFICES

FISHER, WAYLAND, COOPER AND LEADER

1255 TWENTY-THIRD STREET, N.W.

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CHARLES V. WAYLAND
(1910-1980)

OF COUNSEL
JOHN O. HEARNE

MCI MAIL FWCLDC

(202) 775-3546

December 11, 1991

RECEIVED

DEC 11 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

*NOT ADMITTED IN D.C.

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms. Searcy:

Educational Media Foundation, Inc. ("EMF"), the proposed assignee of KRDG(AM), Redding, California, hereby submits an FCC Form 301 application requesting a waiver of the main studio rules with respect to that station. EMF's acquisition of KRDG has been approved by the Commission (See FCC File No. BAL-910802), and a closing is expected in the very near future.

On November 21, 1991, EMF filed an FCC Form 340 application requesting authority to operate the station as noncommercial educational facility. At the same time, that application requested a waiver of the main studio rules. By informal staff request, EMF has been asked to submit a 301 application seeking the main studio rule waiver. That application is submitted herewith.

As this request is filed by a nonprofit entity who will be operating its station noncommercially, no fee filing is required. Thus, none is submitted.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,

David D. Oxenford

DDO/vm
Enclosure
9748-002

APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

For COMMISSION Fee Use Only	FEE NO:	For APPLICANT Fee Use Only
	FEE TYPE:	Is a fee submitted with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	FEE AMT:	If fee exempt (see 47 C.F.R. Section 1.1112), indicate reason therefor (check one box): <input checked="" type="checkbox"/> Noncommercial educational licensee <input type="checkbox"/> Governmental entity
	ID SEQ:	FOR COMMISSION USE ONLY FILE NO. <i>BML-911211AA</i>

Section I - GENERAL INFORMATION

1. Name of Applicant Educational Media Foundation, Inc.			Send notices and communications to the following person at the address below: RECEIVED		
			Name Richard Jenkins President DEC 11 1991		
Street Address or P.O. Box 2290 Airport Boulevard			Street Address or P.O. Box FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY 2290 Airport Boulevard		
City Santa Rosa	State CA	ZIP Code 95403	City Santa Rosa	State CA	ZIP Code 95403
Telephone No. (Include Area Code) (707) 528-9236			Telephone No. (Include Area Code) (707) 528-9236		

2. This application is for: ☒ AM ☐ FM ☐ TV

(a) Channel No. or Frequency 1330 kHz	(b) Principal Community	City Redding	State CA
--	-------------------------	-----------------	-------------

(c) Check one of the following boxes:

☐ Application for NEW station

☐ MAJOR change in licensed facilities; call sign: _____

☒ MINOR change in licensed facilities; call sign: *(studio waiver)* **KRDG**

☐ MAJOR modification of construction permit; call sign: _____

File No. of construction permit: _____

☐ MINOR modification of construction permit; call sign: _____

File No. of construction permit: _____

☐ AMENDMENT to pending application; Application file number: _____

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section I and those other portions of the form that contain the amended information.

3. Is this application mutually exclusive with a renewal application? ☐ Yes ☒ No


If Yes, state:

Call letters	Community of License	
	City	State

SECTION VII - CERTIFICATION (Page 5)

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.
U.S. CODE, TITLE 18, SECTION 1001.

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant Educational Media Foundation, Inc.	Signature 
Date 12-4-11	Title President

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Excerpts of November 21, 1991 FCC Form 340
Application Containing Studio Waiver Request Justifications

RECEIPT COPY

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November 21, 1991

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OF COUNSEL
JOHN Q. HEARNE

MC MAIL FVCLDC

RECEIVED

NOV 21 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: KRDG (AM) Redding, California
Request for (1) Non-commercial Educational
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The Commission has established a policy of considering waiver requests of the main studio rule by non-commercial stations on a case-by-case basis. See Main Studio and Program Origination Rules, 3 FCC Rcd 5024, 5026 (1988). The Commission's policy is a recognition of "the benefits of centralized operations for non-commercial educational stations, given the limited funding available to these stations." Id. "Waivers have been granted to state and public television networks to operate "satellite" stations that do not necessarily meet the requirements of the main studio rule." Id. See e.g. Nebraska Educational Television Commission, 4 RR 2d 771 (1965); Central Virginia Educational Television Corp., 49 RR 2d 435 (1981). Recently, where the benefits of centralized broadcast operations were demonstrated by an educational applicant, the Commission granted a waiver of the main studio rule and permitted a non-commercial AM station to co-locate its main studio with another station operated by the applicant. The waiver request proposed that the non-commercial AM would be operated as a "satellite" of the applicant's other facility. See Letter to Gerald Stevens-Kittner, Esq. re KAGI (AM), Grants Pass, Oregon (File No. BAL-910226EC) (M.M.Bur. July 15, 1991) (copy attached hereto). The waiver was conditioned upon the applicant maintaining the public file in the non-commercial AM's city of license; the installation of a toll-free telephone number for residents of the city of license; and an imposition of a condition that the AM license remain non-commercial. Id.

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Ms. Donna R. Searcy
November 21, 1991
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Moreover, EMF recognizes the importance of a licensee's remaining aware of community concerns and being accessible to local residents on a face-to-face basis. Thus, EMF plans to have employees in Redding on a regular basis to access community needs. In connection with its recognition of these obligations, EMF will staff KRDG's Redding studio at least two days of each week and will publicize the days and times at which the Redding studio will be staffed.

In that EMF's proposed operation conforms with standards established by previous Commission waiver grants for non-commercial, educational applicants, EMF submits that a grant of its waiver request would be in the public interest and should therefore be granted.

As EMF is an educational licensee, no filing fee is necessary. Therefore, none is submitted.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,


David D. Oxenford

cc: Brian Browdie, AM Branch

[9748-002]

Educational Media Foundation, Inc.
October 7, 1991

Request For Waiver of Main Studio Rule

EMF hereby requests a waiver of 47 C.F.R. § 73.1125(a) (1990) (hereinafter "main studio rule") to allow KRDG (AM) Redding, California to operate its main studio with a reduced staff presence. If this waiver request is granted, KRDG would be operated as a satellite of co-owned KLVR (FM-ED) Santa Rosa, California.

EMF desires to operate KRDG as a non-commercial, educational station. A grant of this waiver would permit EMF to offer a higher quality educational radio service to Redding than would be possible were EMF required to program KRDG from a main studio located in Redding.

In order to fulfill its local program service responsibilities, EMF will incorporate into its public affairs and informational programming originated on KLVR (FM-ED) programming of unique concern to residents of Redding and will maintain a studio in Redding capable of producing locally-oriented programming. EMF will maintain KRDG's public inspection file in Redding in a location accessible during normal business hours. It will also provide a toll-free telephone number for residents of Redding to reach KRDG's studio in Santa Rosa. EMF will staff KRDG's Redding studio at least two days of each week and will publicize the days and times at which the Redding studio will be staffed.

In that EMF's proposed operation conforms with standards established by previous Commission waiver grants for non-commercial, educational applicants, EMF submits that a grant of its waiver request would be in the public interest and should therefore be granted.

LAW OFFICES

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FISHER, WAYLAND, COOPER AND LEADER

1255 TWENTY-THIRD STREET, N.W.

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WASHINGTON, D. C. 20037-1170

TELEPHONE (202) 659-3494

TELECOPIER (202) 296-6518

WRITER'S DIRECT NUMBER

(202) 775-3546

December 11, 1991

BEN S. FISHER

(1890-1954)

CHARLES V. WAYLAND

(1910-1980)

OF COUNSEL

JOHN Q. HEARNE

MCI MAIL: FWCLDC

RECEIVED

DEC 11 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEN C. FISHER
GROVER C. COOPER
MARTIN R. LEADER
RICHARD R. ZARAGOZA
CLIFFORD M. HARRINGTON
JOEL R. KASWELL
KATHRYN R. SCHMELTZER
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DAVID D. OXENFORD
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ANN K. FORD
BRUCE D. JACOBS
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JOHN JOSEPH McVEIGH
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GREGORY L. MASTERS*
MATTHEW P. ZINN
ROBERT C. FISHER
LAUREN ANN LYNCH*
BRIAN J. CARTER
GLENN S. RICHARDS*

*NOT ADMITTED IN D.C.

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms. Searcy:

Filed herewith, on behalf of Educational Media Foundation, Inc. ("EMF"), is application on FCC Form 302 for station KRDG(AM), Redding, California. EMF is the proposed assignee of KRDG. The assignment application, FCC File No. BAL-910802EF, has been approved by the Commission, and should be closed within the very near future. On November 21, 1991, EMF filed an FCC Form 340 application, requesting that the Commission authorize that station to operate as a noncommercial educational facility.

By informal staff request, the applicant was requested to submit an FCC Form 302. The Form 302 is attached herewith, with a copy of the original filed 301 application submitted as an attachment thereto.

As this application is filed by a nonprofit entity who will be operating the station noncommercially, no fee is required. Thus, none is submitted.

DEC 12 1991

AMC BRANCH

BML91121AA

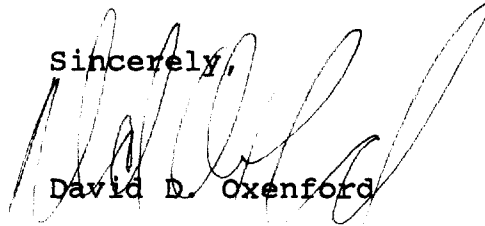
Amendment
file #

91121AA

Ms. Donna R. Searcy, Secretary
December 11, 1991
Page 2

Should there be any questions concerning this matter, please
contact the undersigned.

Sincerely,

A handwritten signature in dark ink, appearing to read "David D. Oxenford", written over the printed name.

David D. Oxenford

DDO/vm
Enclosure

9748-002

APPLICATION FOR NEW BROADCAST STATION LICENSE

(Carefully read instructions before filling out Form)

RETURN ONLY FORM TO FCC

For <u>Commission</u> Fee Use Only	FEE NO:	For <u>Applicant</u> Fee Use Only Is a fee submitted with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, indicate reason therefor (check one box): <input type="checkbox"/> Nonfeeable application Fee Exempt (See 47 C.F.R. Section 1.1112) <input checked="" type="checkbox"/> Noncommercial educational licensee <input type="checkbox"/> Governmental entity
	FEE TYPE:	
	FEE AMT:	
	ID SEQ:	

RECEIVED

SECTION I - GENERAL DATA

DEC 11 1991

For Commission Use Only

File No.

Legal Name of Applicant Educational Media Foundation, Inc.	FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY	Mailing Address 2290 Airport Boulevard City Santa Rosa State CA Zip Code 95403 Telephone No. (include area code) (707) 528-9236
---	--	--

1. Facilities authorized by construction permit

This application is for:

☐

Commercial

☐

Noncommercial

☐

AM Directional

☐

AM Non-Directional

☐

FM Directional

☐

FM Non-Directional

☐

TV

Call Letters KRDG	Community of License Redding	Construction Permit File No. California	Modification of Construction Permit File No(s). N/A	Expiration Date of Last Construction Permit N/A
--------------------------	-------------------------------------	---	---	---

2. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620? ☐ Yes ☐ No

N/A

If No, explain.

3. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met? ☐ Yes ☐ No

N/A

If No, state exceptions.

4. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect? ☐ Yes ☐ No

If Yes, explain.

N/A

5. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)? ☐ Yes ☐ No

If No, explain.

N/A


☐ Does not apply

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATION

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant Educational Media Foundation, Inc.	Signature 
Title President	Date 12-4-91

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT,
U.S. CODE, TITLE 18, SECTION 1001.

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the benefit requested is consistent with the public interest. The staff, consisting variously of attorneys, engineers, and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authorization.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

RECEIPT COPY

LAW OFFICES

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WASHINGTON, D. C. 20037-1170

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WRITER'S DIRECT NUMBER

(202) 775-5546

November 21, 1991

BEN S. FISHER

(1990-1994)

CHARLES V. WAYLAND

(1910-1990)

OF COUNSEL

JOHN Q. HEARNE

MCI MAIL FWCLOD

BEN C. FISHER
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*NOT ADMITTED IN D.C.

RECEIVED

NOV 21 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: KRDG (AM) Redding, California
Request for (1) Non-commercial Educational
Broadcast Construction Permit; and (2) Waiver
of Main Studio Rule

Dear Ms. Searcy:

Educational Media Foundation, Inc. ("EMF"), by its attorneys, submits this application for a non-commercial educational broadcast station construction permit. On September 12, 1991 (File no. BAL 910802EF), the Commission granted the assignment of KRDG from Prather-Breck Broadcasting to EMF. As EMF desires to operate KRDG as a non-commercial, educational station, subject to the rules relating to such stations, this Form 340 application is being filed. In addition, EMF hereby requests a waiver of 47 C.F.R. § 73.1125(a) (1990) (hereinafter "main studio rule") to allow KRDG(AM) Redding, California to operate its main studio with a reduced staff presence. If this waiver request is granted, KRDG would be operated as a satellite of KLVR(FM-ED) Santa Rosa, California. EMF is licensee of KLVR(FM-ED) which operates as a non-commercial, listener supported, educational radio station. As a satellite of KLVR(FM-ED), KRDG would provide Redding, California with a unique blend of music, programs, and special features, that will serve the educational purposes which have already been recognized by the Commission in connection with KLVR(FM-ED), and which are set out herein.

The Commission has established a policy of considering wavier requests of the main studio rule by non-commercial stations on a case-by-case basis. See Main Studio and Program Origination Rules, 3 FCC Rcd 5024, 5026 (1988). The Commissions' policy is a recognition of "the benefits of centralized operations for non-commercial educational stations, given the limited funding available to these stations." Id. "Waivers have been granted to state and public television networks to operate "satellite" stations that do not necessarily meet the requirements of the main studio rule." Id. See e.g. Nebraska Educational Television Commission, 4 RR 2d 771 (1965); Central Virginia Educational Television Corp., 49 RR 2d 435 (1981). Recently, where the benefits of centralized broadcast operations were demonstrated by an educational applicant, the Commission granted a waiver of the main studio rule and permitted a non-commercial AM station to co-locate its main studio with another station operated by the applicant. The waiver request proposed that the non-commercial AM would be operated as a "satellite" of the applicant's other facility. See Letter to Gerald Stevens-Kittner, Esq. re KAGI (AM), Grants Pass, Oregon (File No. BAL-910226EC) (M.M.Bur. July 15, 1991) (copy attached hereto). The waiver was conditioned upon the applicant maintaining the public file in the non-commercial AM's city of license; the installation of a toll-free telephone number for residents of the city of license; and an imposition of a condition that the AM license remain non-commercial. Id.

EMF is in a similar position to those educational applicants who have been granted waivers of the main studio rule. In this case, EMF seeks a waiver of the main studio rule to operate KRDG as a non-commercial educational satellite, principally retransmitting KLVR(FM-ED)'s programming over KRDG. A grant of this waiver would permit EMF to offer a higher quality educational radio service to Redding than would be possible were EMF required to program KRDG from a main studio located in Redding. Educational programming requires a significant staffing commitment to produce quality programming. As a private, non-commercial educational broadcaster, EMF's limited resources would preclude the staffing and full-time operation of a main studio in Redding, without an economic drain which could damage the quality of programming it produces in Santa Rosa.1/

1/ The Commission has never created a distinction between "public" and "private" educational noncommercial operations. Private educational broadcasters, such as EMF, face stiffer economic realities than state or public broadcasters who benefit from public monies. EMF, on the other hand, is supported only by donors and programming grants, and does not otherwise receive governmental or institutional support.

Ms. Donna R. Searcy
November 21, 1991
Page 3

Moreover, the history of KRDG does not bade well for a separate, fully staffed operation at this time. EMF is acquiring KRDG from a company which, EMF understands, during the course of its operation of the station, suffered losses totaling Two-Hundred Fifty-Thousand dollars (\$250,000.00). As was set forth in the contract accompanying the assignment application, EMF essentially purchased KRDG for less than \$50,000, a sum which is to be paid to creditors of the licensee. Given this financial history, it is clearly not economically reasonable for EMF to attempt a full scale operation of this stand-alone AM station.

In order to fulfill its local program service responsibilities, EMF will incorporate into its public affairs and informational programming matters of unique concern to residents of Redding and will maintain a studio in Redding capable of producing locally-oriented programming. EMF will maintain KRDG's public inspection file in Redding in a location accessible during normal business hours. It will also provide a toll-free telephone number for residents of Redding to reach KLVR's studio in Santa Rosa.

Moreover, EMF recognizes the importance of a licensee's remaining aware of community concerns and being accessible to local residents on a face-to-face basis. Thus, EMF plans to have employees in Redding on a regular basis to access community needs. In connection with its recognition of these obligations, EMF will staff KRDG's Redding studio at least two days of each week and will publicize the days and times at which the Redding studio will be staffed.

In that EMF's proposed operation conforms with standards established by previous Commission waiver grants for non-commercial, educational applicants, EMF submits that a grant of its waiver request would be in the public interest and should therefore be granted.

As EMF is an educational licensee, no filing fee is necessary. Therefore, none is submitted.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,


David D. Okenford

cc: Brian Browdie, AM Branch

[9748-002]

FCC Form 340

Filed November 21, 1991